

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**MICHAEL COREY JENKINS, *et al.***

**Plaintiffs**

**v.**

**Civil Action No. 3:23-cv-374-DPJ-ASH**

**RANKIN COUNTY, MISSISSIPPI, *et al.*,**

**Defendants**

**MOTION FOR LEAVE TO DEPOSE CHRISTIAN DEDMON  
PURSUANT TO FED.R.C.P. 30(A)**

**COME NOW** the Plaintiffs, Michael Jenkins and Eddie Parker, by and through Counsel, and move this Honorable Court for leave to depose Christian Dedmon, pursuant to Fed.R.C.P. 30(a)(2)(b), and would show unto the Court as follows:

1. The Plaintiffs desire to take the deposition of Christian Dedmon, who is a material witness related to the Defendant's defense of qualified immunity who is currently housed at FCI Fairton, located in Fairton, New Jersey.
2. Pursuant to Fed.R.C.P. 30(a)(2) (B) A party must obtain leave of court, and the court must grant leave to the extent consistent with Fed.R.C.P. Rule 26(b)(1) and (2) if the deponent is confined in prison.
3. Accordingly, the Plaintiffs respectfully request leave of court to depose Christian Dedmon, who is confined in prison.
4. The purpose of the deposition is qualified immunity-related discovery and will occur on or prior to the discovery deadline set by this court.
5. Pursuant to L.U.Civ.R.7(b)(10), the undersigned counsel has discussed the instant motion with counsel for the defendants, Bryan Bailey and Rankin County, and upon information and belief, the Motion is unopposed.

6. Due to the simple and straightforward nature of the motion, undersigned counsel requests to be relieved of any obligation to file any accompanying memorandum of authorities.

**WHEREFORE, ABOVE PREMISES CONSIDERED**, the Plaintiffs pray that this Honorable Court will grant its leave to take the deposition of Christian Dedmon.

**RESPECTFULLY SUBMITTED, THIS THE 16<sup>TH</sup> DAY OF JANUARY, 2025.**

/S/ TRENT L. WALKER  
TRENT WALKER, Esq., MSB#10475

**TRENT WALKER, COUNSELOR AT LAW**  
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**CERTIFICATE OF SERVICE**

I, Trent L. Walker, attorney for the defendant do hereby certify that I have this day served a copy of the foregoing document, via U.S. mail and CM/ECF to the following counsel of record:

**Jason Dare, Esquire**  
**BIGGS, INGRAM & SOLOP,**  
**578 Highland Colony Pkwy**  
**Paragon Two, Suite 100**  
**Ridgeland, MS 39157**

This the 16th day of January, 2025.

/s/ TRENT L. WALKER  
TRENT WALKER, MSB#10475